

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

CIVIL ACTION NO. 04-30177-PBS

**JOEL PENTLARGE,
Plaintiff,**

v.

**ROBERT MURPHY, *et al.*,
Defendants.**

**MOTION TO FILE MEMORANDUM IN EXCESS OF
TWENTY PAGES OF DEFENDANTS MASSACHUSETTS
DEPARTMENT OF CORRECTION, KATHLEEN DENNEHY
AND ROBERT MURPHY**

Now come defendants the Massachusetts Department of Correction (“DOC”), Robert Murphy and Kathleen Dennehy (collectively, the “DOC Defendants”) and move this Honorable Court to allow them to file a memorandum in support of their Motion to Dismiss in excess of the 20 pages permitted pursuant to LR. 7.1(B)(4).

As grounds therefor, the DOC Defendants state that the plaintiff has filed multiple complaints against the DOC Defendants, advancing numerous legal theories. All totaled the complaints include over 159 paragraphs and 12 counts (11 of which relate to the DOC Defendants). As such, it is in the interest of justice to allow the DOC defendants to file a longer memorandum.

WHEREFORE, the DOC Defendants respectfully request that this Honorable Court allow this motion.

Defendants Massachusetts Department of
Correction, Robert Murphy and Kathleen
Dennehy,

NANCY ANKERS WHITE
Special Assistant Attorney General

By /s/ Mary P. Murray
Mary P. Murray, Counsel (BBO # 555215)
Department of Correction
Massachusetts Treatment Center
30 Administration Road
Bridgewater, Massachusetts 02324
(508) 279-8184
(508) 279-8181 (fax)
MPMurray@DOC.state.ma.us

Dated: March 1, 2005

Certificate of Service

I hereby certify that I caused a copy of the within document to be served as follows:
(1) *Pro Se* Plaintiff Joel Pentlarge, by intra-facility mail, Massachusetts Treatment Center
30 Administration Road, Bridgewater, MA 02324
&
(2) Defendants Natalya Pushkina and Debra O'Donnell, by first class mail, postage pre-paid
upon their counsel of record, Kevin Mulvey, Esquire, Mulvey & Sneider, LLP, 1622A Beacon
Street, Brookline, MA 02446-2201.

/s/ Mary P. Murray
Mary P. Murray

Dated: March 1, 2005